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January 5, 2011

VIA FACSIMILE

The Honorable P. Kevin Castel
United States District Court, Southern District of New York
Daniel Patrick Moynihan, United States Courthouse
500 Pearl Street
New York, New York 10007
Fax: (212) 805-7949

Re: *Franqui v. Bolton, et al.*,
Case No. 1:10-cv-7391 (PKC)

Dear Judge Castel:

We represent Defendant Tullett Prehon PLC ("Defendant" or "TP PLC") in connection with the above referenced action. Pursuant to Your Honor's Individual Rules of Practice, and for the reasons outlined below, Defendant respectfully requests a pre-motion conference for its Motion to Dismiss in lieu of an Answer to Plaintiff, Jessica Franqui's ("Plaintiff") Verified Amended Complaint, dated October 22, 2010 ("Amended Complaint" or "Amended Compl.>").

By way of background, on August 5, 2010, Plaintiff filed her initial complaint with the Supreme Court of the State of New York, County of New York ("Initial Complaint" or "Initial Compl.") against Marcus Bolton, Tullett Prehon Americas Corp. ("TPAC"), Tullett Prehon (Americas) Holdings Inc. ("TPAH") and TP PLC (collectively, "Defendants"). On September 27, 2010, Defendants filed a Notice of Removal of Action in accordance with 28 U.S.C. § 1332. On October 4, 2010, defendants Marcus Bolton, TPAC and TPAH filed a Partial Motion to Dismiss the Initial Complaint with this Court ("October 4 Motion").

On October 8, 2010 this Court issued an order ("October 8 Order") wherein Your Honor stated that "Plaintiff should consider withdrawing or repleading the claims addressed in the [October 4 Motion]" Your Honor then instructed Plaintiff to either withdraw, replead or amend her claims by October 22, 2010 or, in the alternative, oppose Defendants' October 4 Motion by October 30, 2010. On October 25, 2010, Plaintiff filed the Amended Complaint. On December 3, 2010, TP PLC accepted service of the Amended Complaint. Currently, Defendant TP PLC's time to answer, move or otherwise respond to the Amended Complaint is January 16, 2011.

The Amended Complaint sets forth fifteen causes of action against Defendants sounding in hostile work environment under the New York State Human Rights Law, N.Y. Exec. Law §§ 296 *et seq.* ("NYSHRL") and the New York City Human Rights Law, N.Y. City Admin. Code §§ 8-101 *et seq.* ("NYCHRL"), negligent hiring and intentional infliction of emotional

I will take up the proposed motion at the Jan 24 conference. Plaintiff should respond in writing for the chambers by Jan 14. SO ORDERED
[Signature]
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